

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Neuman Aluminium Impact Extrusion, Inc.
Waynesboro, Augusta County, Virginia
Permit No. VRO81346

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Neuman Aluminium Impact Extrusion, Inc. has applied for a Title V Operating Permit for its Waynesboro, Virginia facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact: Kathleen T. Haddock Date: 8/3/2011

Kathleen T. Haddock, P.E.
540-574-7863

Air Permit Manager: Janardan R. Pandey Date: 8/4/2011

Janardan R. Pandey, P.E.

Deputy Regional Director: B. Keith Fowler Date: 8/4/2011

B. Keith Fowler

FACILITY INFORMATION

Permittee

Neuman Aluminium Impact Extrusion, Inc.
1418 Genicom Drive
Waynesboro, Virginia 22980

Facility

Neuman Aluminium Impact Extrusion, Inc.
1418 Genicom Drive
Waynesboro, Virginia 22980
County-Plant Identification Number: 51-820-0137

SOURCE DESCRIPTION

NAICS Code: 332341 – Metal Cans Manufacturing

Neuman Aluminium Impact Extrusion, Inc. (Neuman Aluminium) operates an aluminum can manufacturing facility. Processes at the facility include tumbling of aluminum slugs, impact extruding the slugs into cans, cleaning the cans in degreasers, and packaging. The only emissions from the facility are from the degreasing operations, where trichloroethylene, a volatile organic compound (VOC), is used to clean the cans.

Neuman Aluminium is a Title V major source of hazardous air pollutants (HAP), specifically trichloroethylene (TCE). This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility is currently permitted under a Minor New Source Review (NSR) Permit approved on December 11, 2000, and amended on November 19, 2010 and August 2, 2011. The current Title V operating permit was effective on January 8, 2006 and expired on January 7, 2011.

CHANGES TO THE TITLE V OPERATING PERMIT

All referenced minor NSR permit conditions and dates were updated to reflect the August 2, 2011 and November 19, 2010 amendments to the December 11, 2000 permit. Note that the August 2, 2011 amendment was for the removal of Unit ID 2 from the permit. The deletion of Unit ID 2 from the Title V operating permit was made after the public and EPA comment periods. There were no other changes to the Title V permit resulting from the removal of the unit. The Title V Permit Boilerplate – March 2010 was used to develop the renewal permit.

The following changes were made to the Title V operating permit:

- I. Facility Information
 - Responsible Official updated
 - Contact Person updated
- II. Emission Units
 - Removed Emission Unit IDs 2, 4, 8, and 10
- III. Process Equipment Requirements
 - A. Limitations
 - Removed references to Emission Unit IDs 2, 4, 8, and 10
 - Decreased allowed emissions of VOC and TCE for compliance with Subpart T
 - B. Monitoring
 - Added equations and conditions from Subpart T to be used for determination of compliance with the emission limits, including definition of an exceedance. (Equations were included in the previous Title V permit under the testing requirements.)
 - C. Recordkeeping – no changes
 - D. Testing
 - Added updated boilerplate language and moved equations to monitoring section of permit

E. Reporting

- Updated EPA address

IV. Insignificant Emission Units – removed equipment no longer in use (Unit ID 18)

V. Permit Shield and Inapplicable Requirements – no changes

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit on December 10, 2009, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Degreasing Equipment							
1	1	36-inch x 96-inch Detrex in-line vapor degreaser	3600 parts/hour	Freeboard Refrigeration Device	1	TCE (HAP), VOC	12/11/2000, as amended 11/19/2010 and 8/2/2011
				Freeboard Ratio of 1.0	--		
				Reduced Room Draft	--		
				Freeboard Ratio of 1.0	--		
				Reduced Room Draft	--		
3	3	24-inch x 72-inch Detrex in-line vapor degreaser	3600 parts/hour	Freeboard Refrigeration Device	3	TCE (HAP), VOC	12/11/2000, as amended 11/19/2010 and 8/2/2011
				Freeboard Ratio of 1.0	--		
				Reduced Room Draft	--		
7	7	24-inch x 42-inch Detrex in-line vapor degreaser	4000 parts/hour	Freeboard Refrigeration Device	7	TCE (HAP), VOC	12/11/2000, as amended 11/19/2010 and 8/2/2011
				Freeboard Ratio of 1.0	--		
				Reduced Room Draft	--		

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

A copy of the 2010 annual emission update is attached (*Attachment A*). Emissions are summarized in the following tables.

2010 Actual Emissions

	2010 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO ₂	PM ₁₀	NO _x
Facility-wide	14.770	--	--	--	--
Total	14.770	--	--	--	--

2010 Facility-wide Hazardous Air Pollutant Emissions

Pollutant	2010 Hazardous Air Pollutant Emission in Tons/Yr
Trichloroethylene (TCE)	14.770

EMISSION UNIT APPLICABLE REQUIREMENTS

Degreasing Equipment – Units 1, 3, and 7

The degreasing equipment is currently operating under a minor NSR permit dated December 11, 2000, as amended November 19, 2010 and August 2, 2011.

Limitations – The following requirements are from the minor NSR permit approved on December 11, 2000, as amended November 19, 2010 and August 2, 2011. A copy of the permit is attached (*Attachment B*). The 2010 permit amendment was to reduce allowable emissions of trichloroethylene, a VOC, for compliance with the changes to 40 CFR 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning (MACT) promulgated on May 3, 2007, and to remove Emission Units 4, 8, and 10. The 2011 permit amendment was for the removal of Unit 2; the facility requested the removal of this unit during the Title V renewal process.

These conditions are state BACT requirements from the minor NSR permit and are derived from Subpart T. Condition numbers are from the 2011 amendment. The limitations include emissions controls, operational practices, and emissions limitations.

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|-------------|--|
| Condition 3 | Air disturbances across each vapor degreaser shall be controlled by incorporating a reduced room draft. The permittee shall achieve a reduced room draft by: <ul style="list-style-type: none">a. Ensuring that the flow or movement of air across the top of the freeboard area of each vapor degreaser or within each vapor degreaser enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time, as measured using the procedures in Conditions 16 and 17.b. Establishing and maintaining the operating conditions which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less. |
| Condition 4 | Each vapor degreaser shall be equipped with a freeboard refrigeration device. The permittee shall ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point. |
| Condition 5 | Each vapor degreaser shall have a freeboard ration of 1.0. |

- Condition 6 Each vapor degreaser shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
- Condition 7 Each vapor degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
- Condition 8 Each vapor degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor degreaser rises above the height of the primary condenser.
- Condition 9 Each vapor degreaser shall have a primary condenser.
- Condition 10 The permittee shall meet all of the following work and operational practices:
- a. Control air disturbances across the vapor degreaser openings by incorporating a reduced room draft as described in Condition 0.
 - b. The parts baskets or the parts being cleaned in an open-top vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - c. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - d. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any vapor degreaser unless an equally effective approach has been approved by the DEQ.
 - e. Parts baskets or parts shall not be removed from any vapor degreaser until dripping has stopped.
 - f. During startup of each vapor degreaser, the primary condenser shall be turned on before the sump heater.

- g. During shutdown of each vapor degreaser, the sump heater shall be turned off and the solvent layer allowed to collapse before the primary condenser is turned off.
- h. When solvent is added to or drained from any vapor degreaser, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- i. Each vapor degreaser and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated, to DEQ's satisfaction, to achieve the same or better results as those recommended by the manufacturer.
- j. Each operator of a vapor degreaser shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR 63, Subpart T, Appendix A, if requested during an inspection by DEQ or EPA.
- k. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief but would not allow liquid solvent to drain from the container.
- l. Sponges, fabric, wood, and paper products shall not be cleaned.

Condition 11 An exceedance has occurred if:

- a. The operating conditions established under Condition 3.b. are not met.
- b. The chilled air blanket temperature required in Condition 4 has not been met and was not corrected within 15 calendar days of detection. Adjustments or repairs shall be made to the vapor degreaser or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.
- c. The wind speed required in Condition 3.a. has not been met and was not corrected within 15 calendar days of detection.

Adjustments or repairs shall be made to the vapor degreaser or control device to reestablish required levels. The parameter must be re-measured immediately upon adjustment or repair and demonstrated to be within required limits.

Condition 13 Annual emissions from the operation of the vapor degreasers (Unit Nos. 1, 3, and 7) shall not exceed the limits specified below:

Volatile Organic Compounds (VOC)	15.54 tons/yr
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Trichloroethylene (TCE) (CAS No. 79-01-6)	15.54 tons/yr (14,100 kg/yr)
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Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

Condition 26 of the minor NSR permit requires the permittee to maintain and operate the facility in accordance with good air pollution control practices for minimizing emissions, including minimizing the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions. This includes developing a maintenance schedule, maintaining spare parts, providing written operating procedures and training for operators.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable: 9 VAC 5-50-80 – New Source Standard for Visible Emissions.

The following condition was established in the Title V permit pursuant to this code:

Condition III.A.10: Visible emissions from each vapor degreaser shall not exceed 20 percent opacity except during one six-minute period in any one hour in which the visible emissions shall not exceed 30 percent opacity.

Compliance Assurance Monitoring (CAM)

All applicable monitoring requirements for the degreasers from the MACT standard, Subpart T, have been included in the Title V operating permit. Per 40 CFR 64, Compliance Assurance Monitoring, emission limitations or standards proposed after November 15, 1990 pursuant to §111 or §112 of the Clean Air Act (CAA) are exempt from the requirements of CAM (40 CFR 64.2(b)(1)(i)).

Subpart T was proposed on November 29, 1993 to implement the requirements of §112 of the CAA and is applicable to each degreaser located at the facility. Therefore, the degreasers are exempt from CAM requirements and no additional monitoring is required.

Monitoring - The monitoring requirements in Conditions 14, 15, 16, 17, and 18 of the minor NSR permit were derived from the requirements of the MACT standard, Subpart T and are included in the Title V operating permit. These monitoring requirements meet the Title V monitoring requirements pursuant to 9 VAC 5-80-110 E.

The permit requires the following monitoring:

- Weekly measurement of the temperature at the center of the air blanket during idling mode for each degreaser using a thermometer or a thermocouple;
- Monthly determination of the speed of the automated parts handling system. Speed will be determined by measuring the time it takes for the automated parts system to travel a measured distance. If no exceedances have occurred after a year of monthly monitoring, the permittee may monitor the speed on a quarterly basis. If an exceedance occurs during the quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
- Reduced room draft

As maintained by controlling room parameters (i.e. redirecting fans, closing doors and windows, etc.)

- Quarterly monitoring shall be conducted for wind speed by measuring six inches above the top of the freeboard area of each vapor degreaser. The direction of the wind current shall be determined by slowly rotating a velometer or similar device until the maximum speed is located. A velometer shall be oriented in the direction of the wind current at each of the four corners of each degreaser and the reading shall be recorded for each corner. The average of the wind speed values obtained at each corners shall be recorded.
- Weekly monitoring of the room parameters that are used to achieve the reduced room draft that were established during the initial compliance test.

As achieved by an enclosure (full or partial)

- Monthly monitoring of the wind speed within the enclosure measured by rotating a velometer inside the entrance to the enclosure until the maximum speed is located.
 - Monthly visual inspection of the enclosure to determine if it is free of cracks, holes, and other defects.
- Determine compliance with the facility-wide emissions limit on a 12-month rolling basis.
 - Ensure that each degrease contains only clean liquid solvent;
 - Determine solvent emissions, using the records of all solvent additions and deletions from the previous month, from each solvent cleaning machine using Equation 1:

$$E_{unit} = SA_i - LSR_i - SSR_i \quad \text{.....Equation 1}$$

Where:

E_{unit} = the total TCE emissions from the solvent cleaning machines during the month i, (pounds TCE per month)

SA_i = the total amount of TCE added to the solvent cleaning machines during the month i, (pounds of TCE per month)

LSR_i = the total amount of TCE removed from the solvent cleaning machines during the month i, (pounds of TCE per month)

SSR_i = the total amount of TCE removed from the solvent cleaning machines in solid waste, determined as stated in Condition 18.c, during the month i, (pounds of TCE per month)

- Determine solid waste removed from the solvent cleaning machines, using EPA Reference Method 25d or engineering calculations, as approved by the DEQ.

- Determine the 12-month rolling emissions from each vapor degreaser on the first operating day of the month, using Equation 2:

$$ET_{unit} = \sum_{j=1}^{12} E_{unit} \quad \text{.....Equation 2}$$

Where:

ET_{unit} = the total TCE emissions over the preceding months (pounds TCE emissions per 12-month period)

E_{unit} = TCE emissions for each month (j) for the most recent 12 months (pounds TCE per month)

- Determine the 12-month rolling emissions from each vapor degreaser on the first operating day of the month, using Equation 3:

$$ET_{facility} = \sum_{j=1}^i ET_{unit} \quad \text{.....Equation 3}$$

Where:

$ET_{facility}$ = the total TCE emissions over the preceding 12 months for all vapor degreasers at the facility (pounds of TCE emissions per 12-month period)

ET_{unit} = the total TCE emissions over the preceding 12 months for each unit, j, where i equals the total number of vapor degreasers at the facility (pounds of TCE emissions per 12-month period)

- If the facility-wide emissions limit is not met based on the results of the calculations from Equations 1, 2, and 3, an exceedance has occurred.

Recordkeeping

The minor NSR permit includes requirements for maintaining records of all monitoring and testing required by the permit. These requirements were derived from Subpart T and have been included in the Title V permit. The recordkeeping established in the minor NSR permit meets the requirements of 9 VAC 5-80-110 F and 40 CFR 70.

These records include:

- Owner's manuals, or if not available, written maintenance and operating procedures for the vapor degreasers and control equipment;
- The date of installation for the vapor degreasers and all control devices. If the exact date for installation is not known, a letter certifying that the vapor degreasers and control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted;
- Records of the halogenated HAP solvent content for each solvent used in the vapor degreasers;
- The results of control device monitoring required in Conditions III.B.1, III.B.2, III.B.3, and III.B.4;
- Information on the actions taken to comply with Condition III.A.9. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels;
- The dates and amounts of TCE added to and deleted from each vapor degreaser;
- The solvent composition of the wastes removed from each vapor degreaser as determined using the procedures in Condition III.B.5.c; and
- Total annual emissions of VOC and TCE, calculated monthly as the sum of each consecutive 12-month period. The 12-month sum for each vapor degreaser shall also be retained.

Testing

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permittee shall submit an annual report to the DEQ by March 1 of the year following the one for which the report is being made. The report shall include:

- A signed statement from the facility owner or his designee stating that “All operators of vapor degreasers have received training on the proper operation of the vapor degreasers and their control devices sufficient to pass the test required in 40 CFR 63.463 (d)(10)”.

Note that the federal regulatory citation references condition III.A.8.j of the Title V permit.

- The average monthly solvent consumption in kilograms per month.
- The 12-month rolling total emission estimates calculated each month using the procedures defined in Condition III.B.5 (facility-wide limits).
- Any exceedances of the facility-wide emission limit as determined using the procedures in Condition III.B.5.

One copy of the annual report shall be sent to the EPA.

The permittee shall also submit an exceedance report to the DEQ semiannually. The report shall include:

- Information on action to comply with Condition III.A.9 (chilled air blanket temperature and wind speed requirements).
- If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
- If no exceedances have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

Once an exceedance has occurred, the permittee shall follow a quarterly reporting format. A copy of the exceedance report shall be forwarded to the EPA.

Streamlined Requirements

There are no streamlined requirements for the degreasing operations.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-2003”.

This general condition cites the Articles that follow:

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources.

In addition, this general condition cites the sections that follow:

9 VAC 5-80-80: Application;
9 VAC 5-80-140: Permit Shield; and
9 VAC 5-80-150: Action on Permit Applications

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:

9 VAC 5-40-50: Notification, Records and Reporting; and
9 VAC 5-50-50: Notification, Records and Reporting.

J. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50: Applicability, Federal Operating Permit For Stationary Sources;
9 VAC 5-80-190: Changes to Permits;
9 VAC 5-80-260: Enforcement;
9 VAC 5-80-1100: Applicability, Permits for New and Modified Stationary Sources;
9 VAC 5-80-1605: Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas; and
9 VAC 5-80-2000: Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas.

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180: Facility and Control Equipment Maintenance or Malfunction; and
9 VAC 5-80-110: Permit Content.

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains citations from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M: National Emissions Standards for Asbestos as it applies to demolition and renovation;
40 CFR 61.148, NESHAP Subpart M: National Emissions Standards for Asbestos as it applies to insulating materials; and
40 CFR 61.150, NESHAP Subpart M: National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70: Designated Emissions Standards; and
9 VAC 5-80-110: Permit Content.

STATE ONLY APPLICABLE REQUIREMENTS

The permittee did not identify any state-only enforceable requirements in the application and all requirements in the minor NSR permit are federally enforceable. Therefore, no state-only applicable requirements have been included in the Title V permit.

FUTURE APPLICABLE REQUIREMENTS

The permittee did not identify any future applicable requirements in the application, nor did DEQ staff identify any requirements that may be subject to the permitted equipment. Therefore, no future applicable requirements have been included in the Title V permit.

INAPPLICABLE REQUIREMENTS

The permittee did not identify any inapplicable requirements in the application. The following requirements were determined by the DEQ to be inapplicable to the current processes at the facility.

- 40 CFR63, Subpart KKKK – NESHAP for Surface Coating of Metal Cans. Not applicable. Processes at the facility do not include those covered by the subpart including: one-and two-piece draw and iron can body coating, sheet-coating, three-piece can body assembly coating, and end coating.
- 40 CFR 60, Subpart WW – NSPS for the Beverage Can Surface Coating Industry: Not applicable. Processes at the facility do not include exterior base, over-varnish, or inside spray coating operations.
- Rule 4-29 Emissions Standards for Can Coating Application Systems (9 VAC 5-40-4010, et. seq.) is not applicable. The facility does not meet the definition of applicability under the rule and is not located in a VOC control area as designated in 9 VAC 5-20-206.
- The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A.4 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances

during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

- Greenhouse Gases (GHG) – There are no applicable GHG permitting requirements.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
11	Distillation unit for degreasers (electric)	9 VAC 5-80-720 B	TCE	--
12	Tumblers	9 VAC 5-80-720 B	PM-10	--
13	Impact Extrusion	9 VAC 5-80-720 B	PM-10, VOC	--
14	Aboveground storage tank for TCE	9 VAC 5-80-720 B	TCE	--
17	Aboveground storage tank for liquid propane	9 VAC 5-80-720 B	VOC	--
19	Natural gas-fired space heaters	9 VAC 5-80-720 C	--	1.4 Million Btu/hr, total
21	Propane-fueled forklift	9 VAC 5-80-720 A	--	--
22	Consolidated Engineer Co. (CEC) natural gas-fired drop-bottom heat treat furnace	9 VAC 5-80-720 C	--	4.0 Million Btu/hr
23	CEC natural gas-fired age oven No. 1	9 VAC 5-80-720 C	--	1.6 Million Btu/hr
24	CEC natural gas-fired age oven No. 2	9 VAC 5-80-720 C	--	1.6 Million Btu/hr
25	Natural gas-fired water heater	9 VAC 5-80-720 C	--	0.6 Million Btu/hr
26	Natural gas-fired water heater	9 VAC 5-80-720 C	--	0.6 Million Btu/hr
27	Propane-fired water heater for aqueous washer	9 VAC 5-80-720 B	Criteria pollutants, HAP	--

See *Attachment C* for Insignificant Activities emission calculations, as applicable.

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the News-Virginia on June 8, 2011. The 30-day public comment period ran from June 9, 2011 through July 8, 2011. The 45-day EPA review period ran concurrently with the public comment period, ending on July 25, 2011. There were no public or EPA comments received.

ATTACHMENTS

Attachment A – 2010 Emission Inventory

Attachment B – minor NSR permit, approved December 11, 2000, as amended November 19, 2010 and August 2, 2011

Attachment C – Emission data for Insignificant Activities based on 9 VAC 5-80-720 B

Attachment D – Email confirming Insignificant Activities emissions, May 13, 2011.

2010 Emission Inventory

Minor NSR

Approved December 11, 2000

As amended November 19, 2010 and August 2, 2011

Emission Data for Insignificant Activities

9 VAC 5-80-720 B

The following units are considered Insignificant Activities based on the annual emissions. Supporting calculations follow for each unit.

Unit Reference No.	Emission Unit Description	Annual Emissions
11	Electric distillation unit for degreasers	Negligible (VOC/TCE)
12	Tumblers	< 1000 pounds PM
13	Impact Extrusion	No emissions
14	TCE aboveground storage tank	84.62 pounds VOC (TCE)
17	Liquid propane aboveground storage tank	Negligible, as tank is maintained under pressure.

Emissions from the equipment indicated above (*) were confirmed by the facility in an email dated May 13, 2011, provided as Attachment D, and summarized on the following page.

Unit ID 11 – Electric Distillation Unit for Degreasers

Closed system used to remove residue from used TCE – emissions negligible.

Unit ID 12 – Tumblers

Closed system used to lubricate aluminum slugs prior to extrusion. Dust (zinc stearate) is collected in a 6 filter system, changed semi-annually. The facility estimates that, based on the maximum usage, uncontrolled emissions would be 1000 pounds PM annually.

Unit ID 13 – Impact Extrusion

This process presses the aluminum slug into the final shape. There is no heat applied, only pressure. In addition there is no dust created during the extrusion process. Emissions are nil.

Unit ID 14 – Aboveground Storage Tank (AST) for TCE

The TANKS 4.0.9d program was used to determine the emissions from the TCE AST.

The following data were input to determine the working and breathing losses from the tank:

Type of Tank – Vertical fixed roof
Tank Dimensions – Diameter: 8.25 feet (given)
Volume: 4400 gallons (588 ft³) (given)
Shell Height: 11.00 feet (calculated)
Annual Throughput – 16360 gallons
Shell/Roof Color – white

Total Emissions due to breathing and working losses: **84.62 pounds per year**

The TANKS report is included after Attachment C.

Unit ID 17 – AST for Liquid Propane

Vapor Pressure – 150 psia
Storage Temperature – 80°F
Tank Dimensions – Diameter: 36 inches
Volume: 500 gallons
Annual Throughput – 1700 gallons

Emissions from the liquid propane tank are negligible as the tank is maintained under pressure.

Insignificant Activities

Emissions Confirmation Email

May 13, 2011